
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Michael A. Hammer
	:	
v.	:	Mag. No. 21-10097
	:	
CHARLES SALINAS, and	:	<u>CRIMINAL COMPLAINT</u>
CORY BRYANT	:	

I, Special Agent George Panatagos, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer of the Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



George Panatagos, Task Force Officer **S.A.**
Drug Enforcement Administration

Sworn to and subscribed via telephone, This
25th day of February 2021 in New Jersey



HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT ONE

(Conspiracy to Possess with Intent to Distribute Oxycodone)

On or about February 23, 2021, in Essex County, in the District of New Jersey, the defendants,

CHARLES SALINAS, and
CORY BRYANT,

did knowingly and intentionally conspire and agree with others to possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT TWO

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 23, 2021, in Essex County, the District of New Jersey, the defendants,

CHARLES SALINAS, and
CORY BRYANT,

during and in relation to a drug trafficking crime for which the defendants may be prosecuted in a court of the United States, namely, the conspiracy to possess with intent to distribute of oxycodone, as charged in Count One of this Criminal Complaint, did knowingly possess, use, and carry a firearm, namely a Jennings Bryco 59, 9MM handgun, bearing serial number 719543.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

ATTACHMENT B

I, George Panatagos, am a Special Agent with the Drug Enforcement Administration ("DEA"), and I am fully familiar with the facts set forth herein based on my own investigation and my conversations with other agents, and members of law enforcement and my review of their reports and of items of evidence. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. Law enforcement is investigating gang-related activity in and around the Newark, New Jersey area. During the investigation, law enforcement learned that law enforcement has learned that CHARLES SALINAS ("SALINAS") and CORY BRYANT ("BRYANT") sell narcotics, including oxycodone pills, in Newark, New Jersey. Moreover, law enforcement learned that SALINAS owns and maintains an apartment in Newark, New Jersey (the "Newark Location") in which he and BRYANT live and operate their narcotics business.

2. Based on the above, law enforcement has been conducting routine surveillance on the Newark Location since in or around January 2021. During that surveillance, law enforcement has observed narcotics-related activity occurring at the Newark Location on at least 30 occasions. Specifically, law enforcement regularly observed unidentified individuals arriving at the Newark Location, sometimes holding U.S. currency in their hands, entering the Newark Location and exiting a short time later without currency in their hands. Based on my training, experience, and knowledge of the investigation, I believe that those individuals were purchasing narcotics from SALINAS and BRYANT while inside the Newark Location. Notably, law enforcement has observed these narcotics transactions occur both while SALINAS and BRYANT are together at the Newark Location and while SALINAS or BRYANT are alone at the Newark Location.

3. On or about February 16, 2021, law enforcement observed an individual ("Individual-1") arrive at the Newark Location. Individual-1 entered the Newark Location and exited a short while later while appearing to manipulate an object inside of his sweatshirt pockets. Law enforcement proceeded to conduct a lawful stop and search of Individual-1 and recovered, among other narcotics, suspected oxycodone pills.

4. Based on the above, on or about February 23, 2021, law enforcement conducted a lawful search of the Newark Location. During that search, law enforcement encountered SALINAS and BRYANT in the living room (the "Living Room") of the Newark Location and placed both under arrest. During the

subsequent search of the Newark Location, law enforcement recovered, among other narcotics, approximately 702 pills (the "Pills") separated into three separate bottles, one of which was stored in the kitchen, and two of which were stored inside of a closet a bedroom (the "Bedroom") located next to the Living Room. The Pills were stored in bottles that did not have prescription labels and neither SALINAS nor BRYANT provided law enforcement with a valid prescription for the Pills. Notably, law enforcement observed that the Pills closely resembled the 3 pills recovered during the search of Individual-1.

5. Law enforcement also recovered in the Bedroom (i) a Jennings "Bryco 59" 9MM handgun, bearing serial number 719543, (ii) an extended 9MM handgun magazine loaded with both hollow-point and ball-point bullets, and (iii) two additional boxes of hollow-point bullets.

6. In total, the Pills weigh approximately 280 grams. Based on my training, experience, knowledge of the investigation, and the markings, or "stamps," on the Pills, I believe that the Pills contain oxycodone. Moreover, I believe that SALINAS and BRYANT were selling the Pills to customers, including Individual-1, without a valid prescription.